

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

7 WEST 57th STREET REALTY COMPANY, LLC, a
Delaware Limited Liability Company,

13-CV-0981(PGG)

Plaintiff,

-vs.-

CITIGROUP, INC., CITIBANK, N.A., BANK OF AMERICA CORP., BANK OF AMERICA, N.A., BARCLAYS BANK PLC, UBS AG, JPMORGAN CHASE & CO., JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, CREDIT SUISSE GROUP AG, BANK OF TOKYO-MITSUBISHI UFJ LTD., COÖPERATIEVE CENTRALE RAIFFEISEN – BOERENLEENBANK B.A., HSBC HOLDINGS PLC, HSBC BANK PLC, HBOS PLC, LLOYDS BANKING GROUP PLC, ROYAL BANK OF CANADA, THE NORINCHUKIN BANK, ROYAL BANK OF SCOTLAND GROUP, PLC, WESTLB AG, WESTDEUTSCHE IMMOBILIENBANK AG, DEUTSCHE BANK AG,

Defendants.

STIPULATION AND [PROPOSED] ORDER ADJOURNING DEFENDANTS' TIME TO RESPOND TO THE COMPLAINT

WHEREAS, the Complaint in this action asserts claims arising out of alleged improper conduct by certain entities with respect to the determination of the U.S. Dollar London Inter-Bank Offered Rate (“USD LIBOR”);

WHEREAS, there is currently pending before Judge Naomi Reice Buchwald an MDL proceeding involving dozens of cases that include similar factual allegations, assert similar claims, and have been brought against the same entities that have been sued in this action, *In re*

LIBOR-Related Financial Instruments Antitrust Litigation, No. 1:11-md-02262 (the “USD LIBOR MDL Proceeding”);

WHEREAS, when this action was commenced, Plaintiff designated this action as related to the USD LIBOR Proceeding, but Judge Buchwald did not accept the related case designation;

WHEREAS, the parties in this action believe that for certain purposes coordination between this action and the USD LIBOR MDL Proceeding may promote judicial economy;

WHEREAS, no previous requests for any extensions have been made in this action;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the parties, and it is ORDERED by the Court that:

1. Subject to the reservation of rights contained in paragraph 4 below, the undersigned Defendants agree to accept service of Plaintiff's Complaint in this action pursuant to Fed. R. Civ. P. 4(h).

2. The undersigned Defendants' time to answer, move to dismiss, or otherwise respond to the Complaint is hereby adjourned until June 4, 2013.

3. This Stipulation shall not act to shorten the response time of any Defendant that would otherwise have a longer period of time to respond to the Complaint pursuant to the Federal Rules of Civil Procedure or any applicable local rules, and shall be without prejudice to any Defendant's right to seek, and Plaintiff's right to oppose, an additional extension of time to respond to the Complaint in this action.

4. Except as to the defense of insufficiency of service of process in this action, no defense of any of the undersigned Defendants, including without limitation defenses based upon lack of personal jurisdiction, is prejudiced or waived by such Defendant's executing, agreeing to, joining, or filing this Stipulation.

5. This Stipulation may be executed in separate counterparts, and counterparts may be executed by e-mail or facsimile, each of which shall be an original.

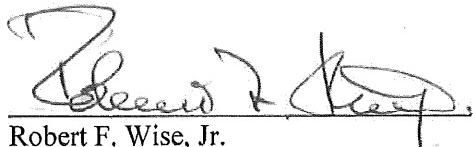
Dated: April 8, 2013



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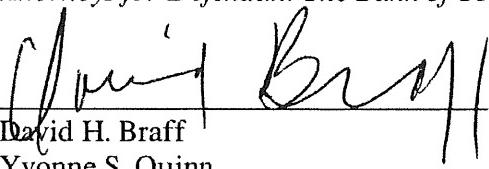
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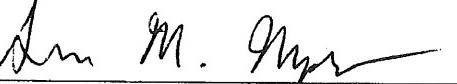
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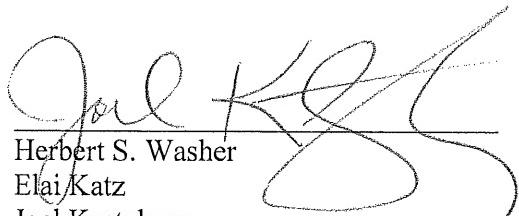
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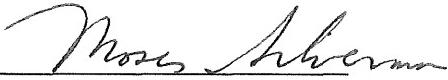
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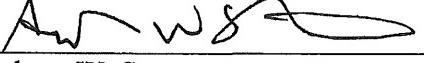
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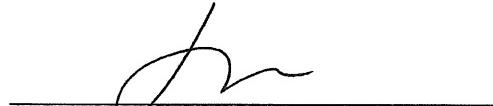


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